April 29, 1998

MEMORANDUM

TO: Orville D. Green, Assistant Administrator
Air & Hazardous Waste

FROM: Susan J. Richards, Chief
Air Quality Permitting Bureau
Air & Hazardous Waste

SUBJECT: Issuance of Non-Substantive Modification of
Tier II Operating Permit #017-00048 to
Interstate Concrete & Asphalt, Sandpoint

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho) for issuing Tier II Operating Permits.

PROJECT DESCRIPTION

This project involves the modification of permit language for fugitive dust control methods. The facility was issued a Tier II Operating Permit (OP) for the RACT/RACM Implementation Project on July 7, 1995.

SUMMARY OF EVENTS

On January 20, 1998, DEQ Central Office received a copy of the permit modification request. On February 19, 1998, the Tier II OP modification was declared complete by AQPB/New Source Review Section.

RECOMMENDATIONS

Based on review of Interstate's submittal and state and federal rules and regulations, the Bureau recommends that Interstate Concrete & Asphalt, Sandpoint, be issued a non-substantive modification to their Tier II Operating Permit. Staff members also recommend that Interstate be notified in writing about the requirement to update the facility's Fugitive Dust Control Plan as necessary. No public comment period is required for this project, and no additional Tier II permit application fees apply.

ODG\SJR\DAM:jrj...\permits\..\ica-mod.IMM

cc: Coeur d'Alene Regional Office
COF
Source File
OP File Manual

April 29, 1998

MEMORANDUM

TO: Susan J. Richards, Chief
Air Quality Permitting Bureau
Air & Hazardous Waste

FROM: Darrin A. Mehr, Air Quality Engineer
Air Quality Permitting Bureau
Operating Permits Section

THROUGH: Daniel Salgado, Air Quality Permits Manager
Air Quality Permitting Bureau
Operating Permits Section

SUBJECT: Technical Analysis for Non-Substantive Modification of Tier II Operating Permit #017-00048
Interstate Concrete & Asphalt (Sandpoint)

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho) (Rules) for the issuance of Operating Permits.

FACILITY DESCRIPTION

Interstate Concrete & Asphalt (Interstate) owns and operates a facility in the Sandpoint Nonattainment Area (SNA) containing both a concrete batch plant and a portable asphalt batch plant. The concrete plant and asphalt plant can operate simultaneously. The asphalt plant was originally issued a State of Idaho Permit to Construct (PTC) in June of 1990. The concrete batch plant was not included in that permit. No aggregate crushing or washing activities occur on-site. The facility was issued a Tier II Operating Permit (OP) on July 7, 1995.

Asphalt Plant

Haul trucks bring crushed aggregate and sand on-site where they are dumped into storage piles. A front-end loader transfers aggregate and sand, as needed, to a three-bin cold feed hopper. Metered quantities of aggregate are fed from the hopper onto a conveyor. The conveyor passes the aggregate through a screen and delivers the aggregate to a natural gas-fired rotating drum dryer. In the drum dryer, the aggregate is heated to approximately 300°F and is transported by a bucket conveyor to a size segregating screen and stored shortly before being reproportioned in a weigh hopper prior to transfer into a pug-mill mixer. In the pug-mill mixer, the aggregate is thoroughly mixed with asphalt oil before either being dropped onto a drag slat conveyor for transport into storage silos or into haul trucks.

The hot-mix asphalt plant is a Barber Greene model DA-65, which is a drum-mix design, with a manufacturer's rated production capacity of 200 tons per hour (T/hr). The burner has a heat input capacity of 36 million British Thermal Units per hour (BTU/hr) and operates on natural gas. PM and PM_{10} emissions from the drum dryer, hot storage bin, weigh scale, and pug mill mixer are controlled by a baghouse. Reclaimed baghouse dust is combined with dried aggregate in the hot storage bin.

Asphalt oil is delivered to the facility by bulk tankers. The tankers transport the asphalt oil to one of the storage tanks. The asphalt plant also loads raw aggregate into haul trucks directly from a front-end loader.

Concrete Plant

Equipment at the concrete batch plant includes the batch unit with cement and aggregate weigh hoppers and load-out conveyor belt, three cement silos (one of which is equipped with a weigh hopper), and elevated aggregate storage bins with charging hopper and conveyor.

Washed rock and sand are derived from off-site source(s) and are transported onto the facility by haul trucks. The sand and aggregate are dumped in the storage pile area shared by the asphalt batch plant. A front-end loader then transfers the aggregate to the charging hopper as needed. From the charging hopper, the aggregate is transported at a rate of 200 tons per hour (T/hr) by a conveyor to the elevated storage bins. The aggregate travels along a conveyor to a weigh hopper where it is transferred directly to a mixer truck in the desired proportions. Raw cement is batched in either of two locations: in the first case, it is discharged directly onto the aggregate conveyor; and in the second case, it is transferred directly to the mixer truck. Water is added at the common aggregate/cement entry point simultaneously. Aggregate and approximately two-thirds of the water are added to the mixer prior to introduction of cement. The last portion of water is added after all other ingredients have been mixed. The mixer truck blends the mixture and transports the concrete off-site. The maximum allowable production capacity for the concrete batch plant is 75 cubic yards per hour (yd^3/hr).

Cement is delivered by bulk tanker truck, which pneumatically conveys the cement to one of three storage silos.

The concrete batch plant provides aggregate for delivery off-site. A front-end loader either transfers the aggregate directly to the haul trucks or to the pea gravel hopper (PG Hopper), which in turn drops the aggregate into haul trucks.

Particulate emissions from the three cement silo bin vents are controlled by two mini baghouses. Bags are cleaned by motor driven shaker. Baghouse cement dust reclaimed by the shaker is returned to the storage bin.

Emissions from operation of the concrete batch plant include fugitive PM and PM_{10} emissions resulting from loader and truck traffic on unpaved roads, aggregate drops, aggregate transport on uncovered conveyors, and wind erosion of exposed storage piles.

PROJECT DESCRIPTION

Interstate requested that DEQ modify the permit language specifying the application frequency of chemical dust suppressant on unpaved roads and traffic areas. Interstate's request was prompted because an inspection of the Sandpoint facility determined that the facility was not properly performing dust suppressant application activities with the conditions of Tier II OP #017-00048, nor was the facility performing the recordkeeping required by the permit conditions.

The facility is formally requesting a change in permit language to allow more flexibility in controlling fugitive dust emissions from unpaved traffic areas (see Appendix A to review Interstate's request).

SUMMARY OF EVENTS

September 4, 1997:	Sandpoint facility was inspected by Tom Harman, DEQ, Coeur d'Alene Regional Office, and Jim Greaves, Environmental Protection Agency, Idaho Operations Office.
January 16, 1998:	DEQ Coeur d'Alene Regional Office received a submittal from Interstate concerning apparent fugitive dust control measures and a request for a change in permit conditions.
January 20, 1998:	DEQ Central Office received a copy of the permit modification request.
February 19, 1998:	Tier II OP modification was declared complete by AQPB/New Source Review Section.

DISCUSSION

1. Emission Estimates and Project Discussion

Interstate's Fugitive Dust Control Plan (referred to as the "Chemical Dust Suppressant Application Plan" in Tier II OP #017-00048) contains the facility's methods for controlling fugitive dust emissions (see Appendix B). Fugitive PM_{10} emissions from vehicle traffic were calculated and directly used in the evaluation of the Sandpoint SIP RACT/RACM project in 1995. The emission controls proposed by Interstate (listed as Conditional Control Measures in the Tier II OP) are reflected in the hourly and annual fugitive emission limits in Appendix A of the permit. The hourly emission rates were used in the computer modeling attainment demonstration for the SIP project. Interstate was issued a permit in 1995 that allowed for certain production increases based on an emissions analysis which included a strenuous level of control identified as being "best available control technology". This level of emissions control was assigned an overall control efficiency of 90%. This is in comparison to typical water application being afforded 50% effective control.

A worst case analysis of PM_{10} emissions from unpaved roads reveals that if Interstate were to relax control measures for fugitive dust emissions from the level of control contained in Interstate's Fugitive Dust Control Plan, dated May 2, 1995, to the level of control that existed in July of 1995, emissions could potentially increase up to nearly three pounds per hour (lb/hr) and up to 1.3 tons per year (T/yr) (see Appendix D). This is based on the assumption that the facility adequately controlled fugitive road dust with water for the concrete batch plant vehicle traffic, and that the asphaltic concrete plant utilized the Fugitive Dust Control Plan created per PTC #0240-0035. That PTC's Fugitive Dust Control Plan called for unpaved roads to be oiled once every two months during the facility's operating season.

Provided Interstate applies the dust oil and/or magnesium chloride in adequate application intensity and frequency to maintain the ground inventory, there would be no increase in fugitive PM_{10} emissions. If, however, the facility fails to maintain the aggressive and effective control measures dust suppressant, PM_{10} emissions could increase by some amount. The actual amount of emissions increase would depend on the total area of reduced fugitive dust control and the vehicle traffic characteristics. The worst case emissions increase would be approximately three lb/hr of PM_{10}, much of which could be attributed to tracking out of dirt and mud from water-treated areas onto the facility's paved roads. Only increased effort toward housekeeping (sweeping and flushing) would control tracking out of material on paved road sections.

Relaxation of the control measures is not being allowed by this permitting action. Rather, DEQ is allowing the facility the flexibility to determine the frequency and application intensity of the dust suppressant(s) while maintaining an aggressive level of fugitive dust control. The burden of maintaining this aggressive level of control lies with the facility. If fugitive dust complaints against the facility are received, and the emissions are identifiably from vehicle traffic contact with unpaved road surfaces, obviously the level of fugitive dust control that Interstate agreed to implement is not being implemented, and further discussions between DEQ and Interstate staff must be initiated to resolve the issue. Fugitive dust complaints against this facility have not been received by DEQ following the applicability of the Fugitive Dust Control Plan as part of the July 1, 1996, Conditional Control Measures.

SUMMARY OF PERMIT LANGUAGE CHANGES

1. Change requirement for application of environmentally Safe Chemical Dust Suppressant (ESCDS) every 30 days during operating season to "as needed".

2. Require recordkeeping of housekeeping practices (sweeping and/or flushing) on paved road areas.

3. Deletion of Permit Condition 3.1 on Page 8 of 14 which limited the speed of vehicle traffic to 5 miles per hour within the facility.

The Permittee must also update the Fugitive Dust Control Plan to reflect these changes and submit a copy to DEQ and keep a current copy on-site. (See Appendix C to review a redline/strikeout version of the permit text).

2. Modeling

No modeling analysis was performed for this project.

3. Area Classification

Interstate is located in the Sandpoint PM_{10} nonattainment area, in Bonner County. The area is designated as attainment or unclassifiable for all other criteria pollutants.

4. Facility Classification

Interstate's Sandpoint facility is not a major facility as defined by IDAPA 16.01.01.008.14. Interstate is not a designated facility, as defined by IDAPA 16.01.01.006.25

5. Regulatory Review

The facility is subject to the following permitting requirements:

a)	IDAPA 16.01.01.200	Procedures and Requirements for Permits to Constructs.
b)	IDAPA 16.01.01.401.03(a)	Tier II Operating Permit Required for Attainment of a National Ambient Air Quality Standard;
c)	IDAPA 16.01.01.403	Permit Requirements for Tier II Sources;
d)	IDAPA 16.01.01.406	Obligation to Comply;
e)	IDAPA 16.01.01.625	Visible Emissions Opacity Restrictions;
f)	IDAPA 16.01.01.650	General Rules for the Control of Fugitive Dust; and
g)	IDAPA 16.01.01.808	Fugitive Dust Control for Asphalt Plants.

FEES

Interstate's request for this modification of the permit does not qualify as a substantive modification. Therefore, a $500.00 Tier II OP fee specified by IDAPA 16.01.01.470 of the Rules is not required. The facility is a non-major facility as defined by IDAPA 16.01.01.008 and, therefore, is not subject to registration fees per IDAPA 16.01.01.525.

RECOMMENDATIONS

Based upon a review of the submittal from Interstate, the Bureau recommends that DEQ issue Interstate Concrete & Asphalt revised pages for Tier II OP #017-00048 to reflect the revised fugitive dust control permit requirements. Staff members also recommend that Interstate be notified in writing that the facility's Fugitive Dust Control Plan be updated as needed. Specified emission limits and operating hour restrictions shall remain unchanged. No public comment is required because this is a non-substantive permit modification.

SJR\OS\OAM:jtj...\permit\...\ics-mod.TAM

Attachments

cc: G. Burr, Coeur d'Alene Regional Office
R. Wilkosz, Technical Services Bureau
Source File
COF

Appendix A

Request for Modification

ROUTING & REQUEST

Please...
- ☐ Read
- ☐ Handle
- ☐ Approve

And...
- ☐ Forward
- ☐ Return
- ☐ Keep or Recycle
- ☐ Review with Me

To: Tim Trumbull
CAB, Boise
From: TOM
Post-it® 7564 C3M 1995
Date:

RSTATE
E & ASPHALT

RECEIVED
JAN 20 1998
DIV. OF ENVIRONMENTAL QUALITY
AIR & HAZARDOUS WASTE

Division of Environment
RECEIVED
JAN 16 1998
Coeur d'Alene Field Office

Coeur d'Alene, ID 83814-2648

Reference: Dust Abatement-unpaved road section, Sandpoint yard, Interstate Concrete & Asphalt

Dear Mr. Harmon:

In response to your letter requesting a method of achieving compliance with our apparent permit violation of not treating our unpaved roadways every 30 days with chemical dust abatement, please find the following corrective measures and clarifications.

As stated in your letter, we did not maintain our monthly records. This was assigned to a specific employee, who has been reprimanded. We take this matter seriously and a monthly review will be established to assure that our record keeping is maintained.

Although not recorded, Interstate did maintain the unpaved roadway sections with weekly and sometimes daily dust abatement with water via our 4,000 gallon water truck applying 1000-1500 gallons per application. These areas had previously been treated with magnesium chloride in July of 1996. We elected not to re-treat these areas in 1997 because magnesium chloride residue was still apparent, which rejuvenated by water application. We found in the previous year (1995-May, June, July), that monthly applications of magnesium chloride resulted in a "residual build-up" which would not penetrate. It also raised concerns about run-off water and storm water run-off.

We would propose to continue using magnesium chloride as a chemical dust abatement but would like the opportunity to amend our permit from current applications of every 30 days to an "as needed" basis in conjunction with weekly water applications. Records of such applications would be maintained, as well as our current maintenance of paved surfaces requiring watering and brooming.

Thank you for your consideration in these matters.

Respectfully,

Larry Peak
General Manager

845 West Kathleen Avenue • Coeur d'Alene, Idaho 83814 • (208) 765-1144 • FAX (208) 765-3773
P.O. Box 1113 • Sandpoint, Idaho 83864 • (208) 263-0538 • FAX (208) 263-5430

Appendix B

Fugitive Dust Control Plan, dated May 2, 1995

INTERSTATE
CONCRETE & ASPHALT

May 4, 1995

Michael R. McGown
Division of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

Subject: Sandpoint Facility

Dear Mr. McGown:

Enclosed is a copy of our Fugitive Dust Control Plan for our Sandpoint Site as you requested in your March 30, 1995 information request. Please call if you have any questions or comments.

Sincerely,

Paul Franz

Paul Franz, P.E.
Engineer

845 West Kathleen Avenue • Coeur d'Alene, Idaho 83814 • (208) 765-1144 • FAX (208) 765-3773
P.O. Box 1113 • Sandpoint, Idaho 83864 • (208) 263-0538 • FAX (208) 263-5430

FUGITIVE DUST CONTROL PLAN

INTERSTATE CONCRETE AND ASPHALT CO.

Sandpoint, Idaho

May 2, 1995

PURPOSE

Implementing a practical and effective fugitive dust control plan is a requirement of our Air Operating Permit issued as part of the Sandpoint PM-10 Implementation Plan. An effective plan that helps Interstate control fugitive dust emissions from the unpaved portions of our site protects our ability to operate and benefits our community through cleaner air.

AMENDMENTS

We anticipate that this plan will have to be amended from time to time do to changing dust control products, changes in product demand, and additional areas being paved. Significant changes, not anticipated with this plan, will require a plan change or update. All such updates should be sent to: Division of Environmental Quality, Operating Permits, 1410 North Hilton, Boise, ID 83706.

DOCUMENTATION

An up-to-date copy of this plan will be maintained at the Sandpoint office of Interstate. One copy of the required log will also be maintained at the Sandpoint office. At a minimum the log will include: application dates and quantities of chemical dust suppressants; application times, dates, and quantities of water; areas treated by the various methods; signatures of operators making applications of dust suppressant or water; the days weather.

DUST CONTROL STRATEGIES

Since no single control method works best in all cases, we have chosen a combined strategy using three different types of dust control measures depending on location, traffic volume, and type of activity occurring in the immediate area. High traffic areas without any loading of unloading or gravel will be paved. Low traffic areas and parking areas without any loading or unloading of gravel will be dust oiled with a commercially available and environmentally safe dust suppressant. Areas in which aggregate materials are handled, loaded, or unloaded will be treated with magnesium chloride supplemented with water. Each control strategy is detailed below. The attached map defines the areas to be treated by each method.

1.) Pavement: Areas that have a high traffic count traveling in a defined roadway which does not experience aggregate spillage will be paved. These areas are primarily entrances and exits or located adjacent to existing paved areas. Paved areas will be broomed and flushed as necessary to maintain a clean surface. The asphalt pavement will be a minimum of 2" thick and shall be maintained in good condition.

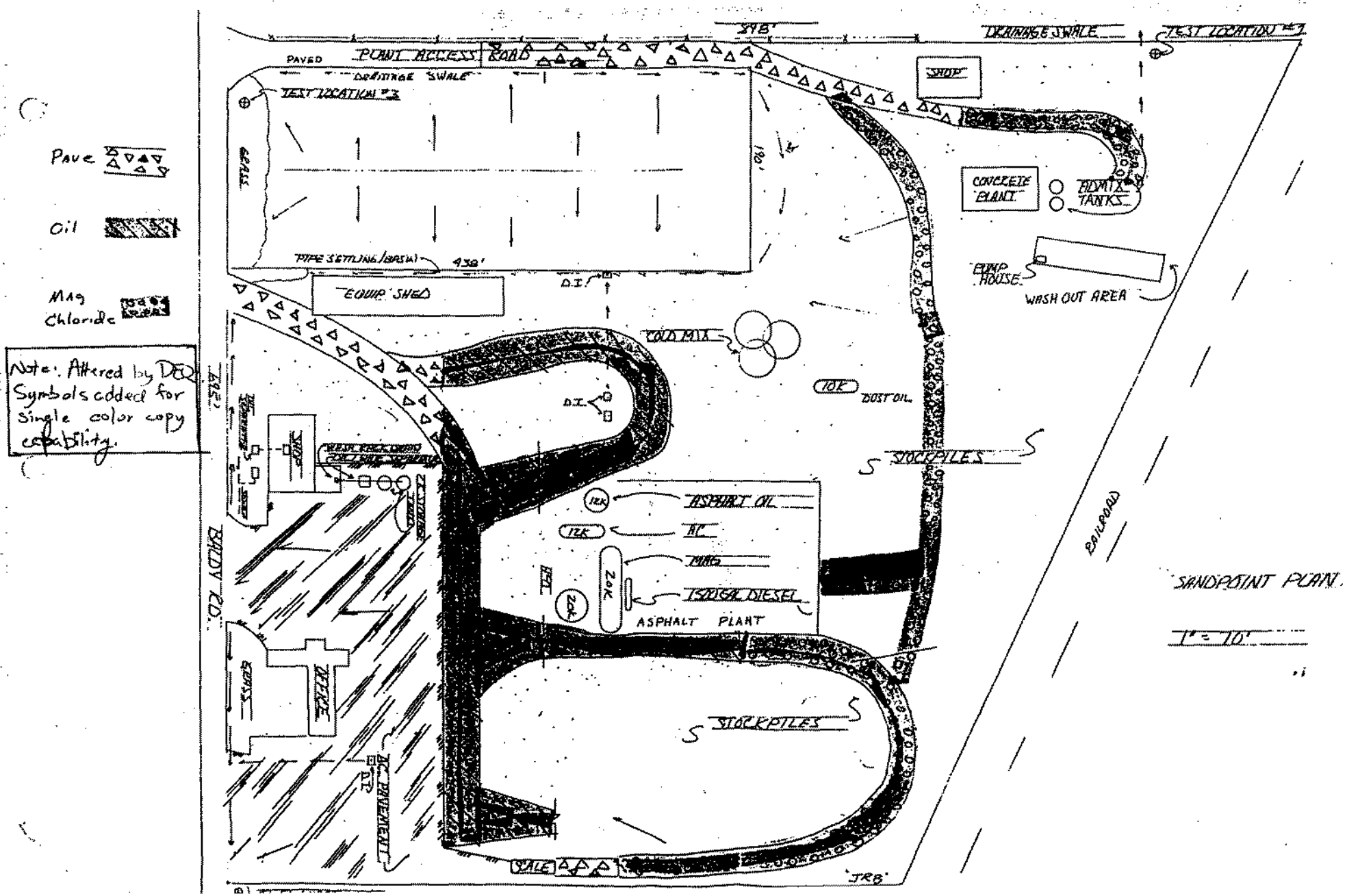
2.) Dust Oil: Areas that have a lower traffic count or areas in which roadways cannot be well defined and do not have gravel handling activities will be dust oiled. These areas are generally adjacent to paved areas. The first application will be 0.25 gallons/sy and will occur as early in the year as precipitation and ground moisture will allow. This is usually between late April and the end of May. Areas will be retreated with a minimum application of .05 gallons/sy each month. Reapplication areas and amounts may be adjusted to account for weather, surface condition, and the ability of the surface to accept the application. Such adjustments to the reapplication schedule or areas treated will be documented in the log. 1000 gallons of dust suppressant is needed to treat an average area of 4000 sy at 0.25 gallons/sy.

3.) Magnesium Chloride: Areas that experience significant spillage of aggregates in the material handling process will be controlled with a combination of magnesium chloride supplemented with water application. These areas are generally around the aggregate stockpiles. The first application of magnesium chloride will be 0.25 gallons/sy and will occur as early in the year as precipitation and ground moisture will allow. This is usually between late April and the end of May. Areas will be retreated with 0.10 gallons/sy magnesium chloride every two months as weather demands. Treated areas will be watered daily or as necessary to maintain the moisture content of the surface. A water truck will be readily available for this purpose. 8.25 tons of magnesium chloride is needed to treat an average area of 6000 sy at 0.25 gallons/sy. 3600 gallons/day of water is needed to treat an average area of 6000 sy during a typical dry summer day. Cool weather, precipitation, and cloud cover will reduce the amount of water that needs to be applied.

HOUSEKEEPING

Good housekeeping is an important part of controlling fugitive dust emissions. The following practices will be used:

1.) Clean up gravel spills in a timely manner.
2.) Maintain the gravel areas to minimize potholes and poor drainage.
3.) Use barricades or other devices to keep traffic out of untreated areas.
4.) Use barricades or other devices to limit the locations where traffic can pass from gravel to paved areas.
5.) Broom and flush pavements that experience tracking from unpaved areas.
6.) Avoid over-watering to prevent mud and tracking problems.


Pave
Oil
Mag Chloride
Note: Altered by DEQ Symbols added for single color copy capability.
PAVED
PLANT ACCESS ROAD
DRAINAGE SWALE
TEST LOCATION #3
GRAVEL
PIPE SETTLING BASIN
430'
EQUIP. SHED
D.I.
SHOP
DRAINAGE SWALE
TEST LOCATION #2
SHOP
CONCRETE PLANT
ASPHALT TANKS
PUMP HOUSE
WASH OUT AREA
COLD MIX
10K
DUST OIL
STOCKPILES
ASPHALT OIL
AC
MAG
ISOSEAL DIESEL
ASPHALT PLANT
12K
20K
STOCKPILES
SCALES
OFFICE
AC PAVEMENT
BALDY RD.
RAILROAD
SANDPOINT PLANT
1" = 10'
SWALE
JRB

FUGITIVE DUST CONTROL LOG

DUST OIL AND MAGNESIUM CHLORIDE APPLICATIONS

DATE	QUANTITY	AREAS TREATED	OPERATOR INITIALS	COMMENTS

FUGITIVE DUST CONTROL LOG

WATER APPLICATIONS

DATE	NUMBER OF APPLICATIONS	QUANTITY IN GALLONS	AREAS TREATED	OPERATOR INITIALS	WEATHER

Appendix C

Redline/Strikeout Version of Revised Tier II OP #017-00048 Pages

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Interstate Concrete & Asphalt
Asphalt Batch Plant and Concrete Batch Plant
Sandpoint, Idaho

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Fugitive Emission Sources

1. SOURCE DESCRIPTION

1.1 Process Description

This section of the permit includes fugitive emission sources. Sources of fugitive emissions include vehicle traffic on paved and unpaved roads, aggregate handling, and stockpile erosion. Various sized aggregates are delivered by truck to the stockpile area. Conveyors deliver sized aggregate to three (3) overhead bins at the top of the concrete plant. Related to asphalt production, a front-end loader transfers aggregate as needed to a four-bin cold feed hopper. Metered quantities of aggregate are fed from the hopper onto two (2) open conveyors in series and delivered to a natural gas-fired drum dryer. Stockpiled sand and gravel are then loaded out into vehicles of various configuration either from the PG Hopper or a front-end loader. Several of these sources have been discussed in previous sections.

1.2 Proposed Conditional Control Measures for Vehicle Traffic

The Permittee shall increase the control measures on unpaved roads and areas and sweep (water flushing as necessary) all paved roads at least weekly.

The Permittee shall pave the proposed access roads and scale area.

2. EMISSION LIMITS

2.1 Fugitive Emissions

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, as required in IDAPA 16.01.01.650 and 808.

2.1.1 All unpaved haul roads and front-end loader travel areas shall be treated with an environmentally safe chemical dust suppressant (ESCDS) as needed. ~~at least once every thirty (30) days during the months of facility operation when the roads are not frozen. The initial ESCDS application each spring shall precede the commencement of hauling materials into or out of the facility and front end loader activity within the facility. The final ESCDS application each fall shall occur no more than thirty (30) days prior to the cessation of such hauling and/or loading.~~ The ESCDS shall be applied in sufficient quantities and frequency so as to provide reasonable control of fugitive dust from the unpaved haul roads and front-end loader travel areas. Water shall be applied to the unpaved traffic areas following the ESCDS applications in the amounts and frequency necessary to control fugitive dust emissions.

2.1.2 Vehicle Traffic Emissions Proposed Control for Conditional Control Measures

The Permittee shall increase fugitive PM_{10} control strategies according to the methods submitted to the Department in the following document: "Fugitive Dust Control Plan", Interstate Concrete & Asphalt Company, Sandpoint, Idaho, May 2, 1995.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Interstate Concrete & Asphalt
Asphalt Batch Plant and Concrete Batch Plant
Sandpoint, Idaho

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Fugitive Emission Sources

3. OPERATING REQUIREMENTS

~~3.1 Speed Limit~~

~~All traffic shall be restricted to an average speed of five miles per hour (5 mi/hr) while traveling on unpaved roads and areas within the facility.~~

3.~~2~~1 Installation of Proposed Conditional Control Measures

The Permittee shall, by no later than July 1, 1996, install the Conditional Control Measures, as described in Section 1.2 of this permit.

4. MONITORING REQUIREMENTS

4.1 Chemical Dust Suppressant Application Plan

4.1.1 The Permittee shall develop and keep current a Chemical Dust Suppressant Application Plan (CDSAP).

4.1.1.1 Brand name and chemical composition of the ESCDS selected for use.

4.1.1.2 Dilution ratio (volume of water: volume of ESCDS) to be used in the formation of each ESCDS solution ready for direct application.

~~4.1.1.3 Projected dates of ESCDS solution application.~~

4.1.1.~~4~~3 Application intensity, in gallons per square yard (gal/yd^2), of the ESCDS solution for each projected treatment date.

4.1.1.~~5~~4 Facility plot plan illustrating the proposed treatment areas.

4.2 ESCDS Application Log

The Permittee shall record the following information each time the ESCDS is applied~~ (i.e., at least every thirty (30) days during the operating season).~~

4.2.1 Brand name and chemical composition of the ESCDS used.

4.2.2 Dilution ratio (volume of water: volume of ESCDS) used to form the ESCDS solution ready for direct application.

4.2.3 Date of ESCDS solution application.

4.2.4 Application intensity (gal/yd^2) of the ESCDS solution.

4.2.5 Facility plot plan illustrating the treated areas.

4.2.6 Name of the firm and of the operator responsible for the ESCDS solution application. The operator shall initial these required records to verify their accuracy.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Interstate Concrete & Asphalt
Asphalt Batch Plant and Concrete Batch Plant
Sandpoint, Idaho

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Fugitive Emission Sources

4.3. Paved Road Control Measures Log

The Permittee shall record in a log the following information:

4.3.1 The date the paved traffic areas are swept (or broomed).

4.3.2 The date the paved traffic areas are flushed with water.

4.3.3 Name of the firm and of the operator responsible for the housekeeping activities listed in Conditions 4.3.1 and/or 4.3.2.

5. REPORTING REQUIREMENTS

5.1 Chemical Dust Suppressant Application Plan.

5.1.1 A copy of the CDSAP shall be made available to Department representatives upon request.

5.1.2 The Permittee shall notify the Department in writing of any changes in an existing CDSAP at least thirty (30) days prior to the proposed date of change.

5.2 ESCDS Application Log

5.2.1 A copy of the ESCDS Application Log and Paved Road Control Log shall be maintained on-site for the most recent two (2) year period.

5.2.2 Access to these records shall be made available to Department representatives upon request.

5.3 The Permittee shall provide notice to the Department within ten (10) days of making the change, as described in Section 1.2 of this permit.

Appendix D

Emission Estimates

INTERSTATE CONCRETE AND ASPHALT. INVENTORY REVIEW.

From: 1995 SIP REVISION. May '95 (PM10 AIR QUALITY IMPROVEMENT PLAN FOR SANDPOINT, IDAHO)

PRE 1996 Controls:	Fugitive PM_{10}	Fugitive PM_{10}	Overall Control
Asphaltic Concrete Plant	0.83 lb/hr	0.33 T/yr.	75%
Concrete Batch Plant	3.04 lb/hr.	1.37 T/yr.	50%
	3.92 lb/hr	1.70 T/yr	

BACT 1996 Control	Fugitive PM_{10}	Fugitive PM_{10}	Overall Control
Asphalt Plant	0.33 lb/hr	0.13 T/yr.	90%
Concrete Batch Plant.	0.61 lb/hr	0.27 T/yr	90%
	0.94 lb/hr	0.40 T/yr	

"BEST CASE" PM_{10} EMISSIONS REDUCTION DUE TO INCREASED FUGITIVE DUST CONTROL MEASURES: 2.98 lb/hr, 1.30 T/yr.

EXISTING 1995 Requirement & Control Methods.
Asphalt Plant was covered by a Permit to Construct #0240-0035.

Dust Oil (DO-1007 by Idaho Asphalt)
0.25 gallons/yd^2 undiluted. Additional Applications occur once every 2 months, until fall shutdown.

PTC #0240-0035 Did NOT affect the concrete batch plant in any way. Water application is the only level required.